

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

MILLENNIUM FUNDING, INC., et al,

Plaintiffs,

v.

WICKED TECHNOLOGY LIMITED et al.,

Defendants.

Civil Action No. 1:21-cv-00282-RDA-TCB

**JOINT MOTION FOR ENTRY OF CONSENT ORDER FOR DISMISSAL AND
INJUNCTION**

Plaintiffs MILLENNIUM FUNDING, INC., EVE NEVADA, LLC, HUNTER KILLER PRODUCTIONS, INC., BODYGUARD PRODUCTIONS, INC., GUNFIGHTER PRODUCTIONS, LLC, MILLENNIUM IP, INC., VOLTAGE HOLDINGS, LLC, KILLING LINK DISTRIBUTION, LLC, LHF PRODUCTIONS, INC., RAMBO V PRODUCTIONS, INC., NIKOLA PRODUCTIONS, INC., OUTPOST PRODUCTIONS, INC., WONDER ONE, LLC and 42 VENTURES, LLC (“Plaintiffs”) and Defendants WICKED TECHNOLOGY LIMITED, VPN.HT Limited (collectively “Wicked Entities”) and, MOHAMED AMINE FAOUANI (“Faouani” and together with the Wicked Entities “Wicked Defendants”) (all collectively, “Parties”), by and through their counsel, hereby file this joint motion for entry of the proposed consent order dismissing all claims the Plaintiffs asserted against the Wicked Defendants with prejudice and the stipulated permanent injunction.

Pursuant to Local Rule 7(j) and Rule 78(b) of the *Federal Rules of Civil Procedure*, the Parties waive a hearing and submit the joint motion for disposition upon the papers filed.

/s/ Kerry S. Culpepper

Kerry S. Culpepper,
Virginia Bar No. 45292
CULPEPPER IP, LLC
75-170 Hualalai Road, Suite B204
Kailua-Kona, Hawai'i 96740
Tel.: (808) 464-4047
Fax.: (202) 204-5181
Email: kculpepper@culpepperip.com
Counsel for Plaintiffs

/s/Benjamin E. Maskell/

Benjamin E. Maskell, Esquire
Va. State Bar No. 78791
MASKELL LAW PLLC
937 N. Daniel St.
Arlington, VA 22201
Telephone: (703) 568-4523
Email: Ben@MaskellLaw.com
*Counsel for Defendants Wicked Technology
Limited, VPN.HT Limited, and Mohamed
Amine Faouani*

CERTIFICATE OF SERVICE

I hereby certify that on Oct. 6, 2021, a true and correct copy of the foregoing was filed electronically with the Clerk of Court using the CM/ECF system, which will send a notification of such filing to the following:

Benjamin E. Maskell, Esquire
MASKELL LAW PLLC
937 N. Daniel St.
Arlington, VA 22201
Email: Ben@MaskellLaw.com
*Counsel for Defendants Wicked Technology
Limited, VPN.HT Limited, and Mohamed
Amine Faouani*

Mary Declan Hallerman
Snell & Wilmer L.L.P.
2001 K Street, N.W.
Suite 425 North
Washington, D.C. 20006
Email: mhallerman@swlaw.com, docket_den@swlaw.com
Counsel for non-party Google, LLC

/s/ Kerry S. Culpepper
Kerry S. Culpepper,
Virginia Bar No. 45292
CULPEPPER IP, LLC
75-170 Hualalai Road, Suite B204
Kailua-Kona, Hawai'i 96740
Tel.: (808) 464-4047
Fax.: (202) 204-5181
Email: kculpepper@culpepperip.com
Counsel for Plaintiffs